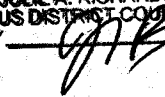


SEALED

FILED

MAY 29 2014

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
No. 5:14-CV-34-F

JULIE A. RICHARDS, CLERK  
US DISTRICT COURT, EDNC  
BY  DEP CLK

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
LAND ROVER VEHICLES, ET AL., )  
 )  
Defendants. )

(CASE UNDER SEAL)  
MOTION FOR EXTENSION  
OF TIME TO EFFECT SERVICE

Plaintiff, the United States, by and through the United States Attorney for the Eastern District of North Carolina, respectfully requests that the Court allow it a second extension of time within which to effect service upon the defendants and potential claimants to the defendants.

On January 24, 2014, the United States filed a verified Complaint for forfeiture with regard to above-captioned defendants.

On April 16, 2014, the United States filed a verified Amended Complaint for forfeiture with regard to above-captioned defendants.

On May 19, 2014, this Court allowed the filing of the United States' verified Second Amended Complaint for forfeiture with regard to above-captioned defendants.

On May 19, 2014 the Court entered a probable cause Order and issued a Warrant of Arrest and Notice In Rem.

The United States respectfully requests that the court allow

the United States an extension of time to effect service upon all defendants and potential claimants in this action for the reasons stated as follows:


1. The defendant vehicles are not in the United States' custody at this time. The client agency, the U. S. Department of Homeland Security, will be attempting to locate and seize the defendant vehicles which are currently located within several states.

2. This instant civil forfeiture case is filed under seal. Hence, service upon any potential claimants cannot be effected until the defendant vehicles have been taken into custody by the U. S. Department of Homeland Security. The documents filed in this action contain substantial background information concerning an ongoing investigation being conducted by the U. S. Department of Homeland Security. Disclosure of the documents would alert potential targets of the existence, scope, and details of the investigation and, therefore, would pose a risk of flight or the destruction of additional evidence and may otherwise compromise the investigation. See Baltimore Sun Co. v. Goetz, 886 F.2d 60 (4th Cir. 1989).

ACCORDINGLY, the Government respectfully requests that the court grant it an extension of time within which to effect service upon the defendants and all potential claimants, up to and including September 26, 2014.

Respectfully submitted this 29th day of May, 2014.

THOMAS G. WALKER  
United States Attorney

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